



**POLAROID CORPORATION**

CAMBRIDGE, MASSACHUSETTS 02139

SHELDON W. ROTHSTEIN  
SENIOR CORPORATE ATTORNEY

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(617) 577-2793

May 10, 1989

Mr. Bruce P. Smith  
Chief Hazardous Waste Enforcement Branch  
United States Environmental Protection Agency  
Region III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

Re: Request for Information Pursuant to Section 104 of CERCLA  
and Section 3007 of RCRA for the Artel Chemical Site, Nitro,  
West Virginia

Dear Mr. Smith:

Enclosed is the response of Polaroid Corporation to the Environmental Protection Agency's April 20, 1989 request for information with respect to the referenced matter.

In the event you require additional information from Polaroid, please contact me directly.

Sincerely,

SWR/ph  
Enclosure

AR201202

BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

Re: The Artel Chemical Site, Nitro, West Virginia

Response Of Polaroid Corporation To Information Request  
In The Referenced Matter

The following is responsive to the Information Request dated April 20, 1989 sent to Polaroid Corporation (Polaroid) by the Federal Environmental Protection Agency with respect to the Artel Site. The only entity included in the collective term "Artel" with which Polaroid had a business relationship was Fike  
-- Chemical, Inc.

- Request No. 1. Any transactions, contracts, communications, arrangements, or activities entered into between or with your company and Artel including but not limited to for each such matter:
- (a) the date of the transaction or other matter;
  - (b) identification of the materials, if any, provided by your company to Artel;
  - (c) an estimate of the volume of each material identified in (b) above;
  - (d) a brief description of the transaction, contract, communication, arrangement or activity, including if possible the payments made by Artel or its representatives to your company, any payments your company made to Artel, and the services to be rendered;
  - (e) any contracts and/or invoices related to the matter;
  - (f) the chemical composition of the materials sent by your company to Artel and the manner in which the substances were stored or contained at the time they were sent;

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- (g) information as to whether the materials sent by your company to Artel pursuant to the contract were by-products, spent chemicals or other waste materials generated by your company's manufacturing processes;
- (h) any contract, agreement, or other arrangement with Artel pursuant to which Artel would manufacture a product or perform a service for your company and your company would lend, rent or otherwise make available to Artel Equipment, personnel, ingredients and/or scientific information to assist in the manufacture of the product or performance of the service for your company;
- (i) the results of any sample analysis performed on the materials sent by your company to Artel;
- (j) any RCRA hazardous waste manifests pertaining to the shipment of materials from your company to Artel.

Answer:

1. (a - f, i and j). All transactions, contracts, communications, arrangements and activities entered into between Polaroid and Artel, including dates of transactions, materials identification, volumes of materials, payment and invoice records, and hazardous waste manifests, are reflected in the documents included in Appendix I hereto.

1. (g). The materials sent by Polaroid to Artel were waste materials generated by Polaroid's manufacturing processes.

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subject. Nonetheless, a list of the pertinent carriers, policy numbers and policy periods is provided in Appendix II hereto.

Signed this 12 day of May, 1989.

POLAROID CORPORATION

By: Thomas J. Lally

Thomas J. Lally

Senior Buyer

AR201205

1. (h). There was no contract, agreement or other arrangement with Artel pursuant to which Artel would manufacture a product or perform a service for Polaroid and Polaroid would lend, rent or otherwise make available to Artel equipment, personnel, ingredients and/or scientific information to assist in the manufacture of a product or performance of a service for Polaroid.

Request No. 2. The identity of, and documents relating to, any person other than your company or representatives of Artel who stored, treated, transported, or disposed, or who arranged for the treatment, disposal, or transportation of the materials identified in Request No. 1 at or to the Site.

Answer: The materials identified in the answer to Request No. 1 were transported from Polaroid to Artel by Traffik Services, Inc., 25 Esten Avenue, Pawtucket, R.I.

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In addition, in the opinion of counsel, Polaroid has been privately insured against releases of hazardous substances. Polaroid is presently involved in litigation against its carriers, whose views differ from Polaroid's views on this

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